

To Whom It May Concern:

March 14, 2005

As the Owner/Director of a Childcare Center, I am writing to inform you of some important recommendations that I strongly feel must be made to the proposed revisions of the childcare licensing rules. My Center, Stepping Stones Daycare and Preschool, is a small, for-profit, one-room Center in the city of Midland, Michigan, licensed for 34 children, ages 2 1/2 – 12 years. We provide before/after school care, a fantastic preschool program, part/full-time childcare, and an educational summer program.

While there are numerous rule changes that I am extremely worried about, the changes that I feel will have the biggest financial burden on Centers and families are as follows:

1. R 400.5102a - Staff Training Requirements.

As current license rules are written, there are no staff training requirements, except for CPR and First Aid training only. However, the Advisory Committee is proposing a drastic increase in staff training hours, as follows:

All caregivers shall complete annual training, exclusive of CPR, First Aid, and Blood Borne Pathogen training. Eight clock hours of training shall be completed the first year after the effective date of these rules; Twelve clock hours of training shall be completed the second year; and Sixteen clock hours of training shall be completed the third year and annually thereafter.

I have many concerns over these new proposed staff training requirements. I feel that requiring centers to go from no staff training hours to 16 is extremely excessive. Yes, they are giving us 3 years to build up to 16, but it is still a huge increase. Also, why aren't CPR, First Aid and Blood Borne Pathogens included in this 16? Does the Committee understand how expensive these trainings are? In addition, how are Centers going to pay for these additional 16 hours, not including the other 3 we are just "required" to do? Yes, the Committee has said that we can conduct the 16 hours of training "in house" to cut down on expense, but I will still have to pay wages to all of my employees in order to meet these 16 hours. I understand the need for staff training to help insure a better quality place for the children we serve, but these rules also need to be realistic! Where is that money going to come from to pay for this training? I will have to raise my parent's childcare rates, which I do not want to do, because many of my families are already struggling to pay their childcare bills.

2. R 400.5103 - Program director qualifications; responsibilities.

As current license rules are written, Program Director qualifications are as follows:

- At least 60 semester hours of credit at an accredited college or university with 12 semester hours in early childhood, child psychology or child development, or
- Possess the Child Development Associate Credential, a Montessori Credential, or similar credential with at least 12 semester hours in early childhood, child psychology or child development

However, the Advisory Committee is recommending that anyone working as a Program Director for less than 5 years at the time the new rules go into effect will have two years to increase their semester hours from 12 to 18, plus have additional hours of experience. First of all, I would like to say that I am extremely offended with this rule revision. I have been doing my job as a Program Director for over 4 years now, and I feel that I do it exceptionally well. Why all the sudden am I unqualified? I obtained my role as Program Director under the qualifications of 60 semester hours with 12 in early childhood. I actually have a Bachelor Degree in Business Administration as well. However, with this rule revision, I would have to go back to school to get 6 more credits of education because I have been a Program Director less than 5 years. I have

never heard of a "boss" hiring someone with "said" qualifications, then down the road saying, "Well, I have changed my mind, unless you go back to school, you can't have your job anymore." They are essentially doing the same thing to all Directors who have been working in this capacity less than 5 years that don't possess these new qualifications. **If the Committee feels that more education is beneficial, then they should require it of "new" Program Directors only, and grandfather in existing Program Directors.** I have done an outstanding job and I feel that this additional education requirement is a "slap in the face" and I do not deserve to be treated that way in my own business! Unfortunately, for many current Program Directors, they cannot afford to go back to school and will lose their jobs. In addition, this is another expense of going back to school that I would have to incur, thus again I would be forced to raise my childcare rates and my families simply won't be able to afford it!

3. **R 400.5103a. Lead caregiver qualifications; responsibilities.**

The way the current license rules are written, there are no Lead caregiver qualifications. However, the Committee is recommending a drastic new role for Lead caregivers that possess at least one of the following:

- a. **Associate's degree in early childhood education or child development**
- b. **Child Development Associate Credential, plus 6 semester hours in a child related field, plus 520 hours of experience**
- c. **Montessori Credential, plus 520 hours of experience**
- d. **High school diploma, plus 12 semester hours in a child related field, plus 1040 hours of experience**
- e. **High school diploma, with a combination of 12 semester hours and/or 18 CEU's to equal 180 hours in a child related field, plus 2080 hours of experience**
- f. **High school diploma, with a combination of 6 semester hours and/or 9 CEU's to equal 90 clock hours in a child related field, plus 4160 hours of experience**

I have many concerns over these new proposed Lead Caregiver qualifications. First, I feel that requiring us to go from no lead caregiver requirements to this is extremely excessive. Yes, these new qualifications would be great in an "ideal" world, but there are many financial burdens that arise from these proposed changes that I do not feel the Committee looked at. These changes would require Centers to have one of these "lead caregivers" in each room with each "group" of children we provide care for. I am very concerned because these "educated" and "trained" people are going to want to be paid a much higher salary, and where is this money going to come from? Payroll is my biggest expense, and I can barely make ends meet now, so I would be forced to AGAIN raise my rates to parents. I don't understand how the Advisory Committee can say that these new proposed changes would hardly affect Centers financially. They are wrong, and in the end, it is the parents who will suffer greatly!

4. **R 400.5105c Group size for preschool children.**

The way the current license rules are written, there is no cap on the number of children you can have in a group, as long as you do not exceed your licensed capacity set by the State and follow current adult to child ratios. However, the Advisory Committee is recommending that maximum group sizes be established per age group as follows:

For children 3 years of age, the maximum group size is 20.

For children 4 years of age, the maximum group size is 24.

**When there are mixed age groups in the same room, in self-contained space,
the group size shall be determined by the age of the youngest child in the group.**

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What does this rule change mean to many others and myself? I will have two options:

- A. Cut my daily enrollment by 41%
 - a. Causing us to raise our rates to families considerably
- B. Construct a divider wall in our one and only room, thus:
 - a. Limiting children's interactions with older siblings
 - b. Limiting educational choices that are available
 - c. Loss of our **ONLY** large motor area
 - d. Increased rates to parents in order to pay for this wall to be constructed, thus losing families who will turn to less quality care or quit their jobs and stay home

To solve this problem, our Center gave the Committee a recommendation at the informal Public Forum to lower teacher to child ratios from the current 1:10 to 1:8, which we already operate at anyway in order to provide top quality care. This smaller ratio would allow us to maintain our one small room, with no divisions, and would provide the children with the better quality care they already get. However, when the Committee made their final revisions, they ignored our request and pleas for re-evaluation. In addition, the Committee is giving an exception to this rule to all Certified Montessori Schools, as their classrooms are set up similar to mine and they wouldn't be able to meet this group size requirement. My question is, how can they give this exception to only Montessori and not to me? Just because we have different philosophies doesn't mean they provide any better care than I do. *I am extremely upset about this exception they are making and feel that the rest of the licensed centers are being discriminated against. To me, the lower ratio would be a much better solution for all of us.*

For your information, my Center is also in the process of preparing for accreditation through the National Association for the Education of Young Children. I have spent the past three years remodeling my Center to meet NAEYC's specifications, i.e. setting up specific play areas to offer different types of sensory choices. If I have to build a dividing wall, areas like my "quiet area" will no longer be available to all of the children. **To me, and my parents, adding this wall isn't going to allow us to provide better quality care, it will only inhibit it more.** And what happens to my three years of work striving to meet accreditation standards?

While I can certainly understand the Child Care Center Rules Advisory Committee's goal of trying to enhance the quality in all childcare centers across the State, I am overwhelmingly concerned about their drastic suggested changes (they doubled the size of the current rule book) and the financial impact they will have on daycare centers and the parents we serve. As you can see from all of these examples (and I only mentioned a few of the many changes that will have a financial impact on me), the bottom line is that the majority of daycare centers will have no choice but to raise their rates to parents in order to meet these new requirements or they will have to CLOSE THEIR DOORS!

Shouldn't our number one goal be to take care of these children? What is going to happen to the children when their parents have to pull them out of a licensed childcare because they can't afford to pay for it anymore? Childcare will just be for the "rich", and the poor and middle class will be left behind. Currently, 18% of my families receive childcare assistance from the Family Independence Agency. If these changes pass and I am forced to raise my rates, is the State going to step up to the plate and raise their reimbursement rate to providers so these struggling parents can still afford childcare? I seriously doubt it! For your information, 12% of my families make less than 30,000/year, and 22% of their monthly budget pays for childcare. In addition, 10% of my families make less than 20,000/year, with 31% of their monthly budget paying for childcare. Many of the families I serve are already struggling to pay their daycare rates and if I am forced to raise rates in order to pay for all these licensing changes, my

Page Four

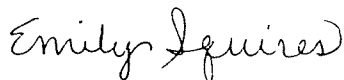
families will have to find less quality, alternative care or quit their jobs and stay home. In an already struggling economy in a State that is in last place for unemployment in our Country, I find it very hard to believe that the Committee has really thought about the financial impact these changes will create.

For your review, I am also enclosing copies of support letters that my parents signed back in October, 2004, when these rule changes were first introduced. As you can see from many of the comments, my parents are not in support of these changes, nor can they afford to pay any more for childcare.

Unfortunately, **we are now in a state of urgency**, as these proposed rules are currently in their final stage of approval. Therefore, we are now asking for your help! Please assist us in making a difference in the children's lives we serve by getting these proposed rules changed once again. **I strongly feel that changes could be made to these proposed rules to help satisfy everyone involved, without sacrificing the quality of care we already provide!**

If you have any questions, please call me at 989-615-2638. I would be happy to answer any questions or better clarify any of these issues if necessary. Also, I thank you, in advance, for your support and assistance with these very important issues. If the Governor's philosophy is to LEAVE NO CHILD BEHIND, then we must act now to make changes to these rules to insure that every parent can afford a quality childcare program!

Sincerely,



Emily Squires

Owner/Director, Stepping Stones Daycare and Preschool, Midland

Enclosures

To: Jim Finnamon, Director, Division of Child Daycare Licensing
Child Care Center Rules Advisory Committee

As a parent of a child currently enrolled at Stepping Stones Daycare & Preschool in Midland, Michigan, I was recently informed about the new regulations being proposed by your Committee. I can certainly understand and appreciate the Committee trying to enhance the quality in all childcare centers across the State, however, I would like to add my support to Stepping Stones' recommendations for changes to the new childcare center rules proposed by the Advisory Committee that I feel will work just as well or better.

I understand they are asking for proposed rule # R 400.5105b to be amended as follows:

R 400.5105b - Group size for preschool children.

Rule 105b. (1) A center shall assure the following maximum group size:

- (a) For children 3 years of age the maximum group size is 20.
 - (1) **An exception shall be granted to centers with rooms caring for not more than 2 groups of children in one self-contained space providing their caregiver to child ratio is lowered to not more than 1:8.**
- (b) For children 4 years of age the maximum group size is 24.
 - (1) **An exception shall be granted to centers with rooms caring for not more than 2 groups of children in one self-contained space providing their caregiver to child ratio is lowered to not more than 1:10.**
- (2) When there are mixed age groups in the same room, in self-contained space, on the playground, or trips away from the center, the group size shall be determined by the age of the youngest child in the group.
 - (a) **An exception shall be granted to centers with rooms caring for not more than 2 groups of children in one self-contained space providing their caregiver to child ratio is lowered to not more than 1:8 or 1:10, depending on the age of the child as specified above.**

This proposed exception would allow for a smaller, one-room center like Stepping Stones to continue to offer the same top-quality childcare we have come to expect at the same family friendly prices that we count on.

I can certainly understand limiting group sizes for larger rooms or centers that have the capability of providing care in multiple classrooms. However, for Stepping Stones, it may mean the following options:

1. They would have to cut their daily enrollment from their current licensed capacity of 34 to the proposed maximum group size of 20, cutting their daily enrollment by 41%. That is an enormous decrease in the amount of families they can provide care for. In doing this, they would be forced to raise their rates that I currently pay by as much as 50% to offset their expenses at a lower enrollment and in order for Stepping Stones to be able to continue providing the quality programs they currently provide. Unfortunately, this is an increase that my family, as well as many others, cannot afford to pay.
2. They would have to remodel their building in order to make two separate classrooms to accommodate their licensed capacity of 34 children. However, I strongly feel that dividing their one room in two would limit the children's wide variety of choices they currently experience. As their one room is currently designed (which was just remodeled within the past three years), they have specific areas for dramatic play,

quiet play, trucks, manipulatives, sensory exploration, etc. This allows the children to make decisions about his/her activities while having the greatest possible number of choices. Their one room center also allows for younger children to be comforted by the presence of their older siblings, allowing them that extra security to become confident when they venture off on their own. If they have to cut their room in half by a dividing wall, options like the quiet area, dramatic play, and sensory centers would have to be limited to only one of the groups at a time, which to me is defeating the purpose of having such educational centers available to the children.

I prefer to send my child to Stepping Stones over a larger center with many separate rooms because I feel it is a top quality program that offers my child a high quality educational program and allows my child freedom of many choices in a bright, happy Center. I strongly feel that the lower ratio of 1 to 8, which Stepping Stones currently operates at, allows my child/children the safest possible, positive learning environment, at a price families can afford. Thank you for taking the time to further evaluate the implications of this regulation, as I am very concerned about the financial impact that your proposed changes would have on Centers and in turn, families across the State.

Sincerely,

Melanie M. Dewey Oct. 14, 2004
Name Date
3410 Cedar St. Midland MI 48640
Address City State ZIP

Additional Comments:

I am a parent of two children currently enrolled in Stepping Stones Daycare. My youngest child had never been away from her parents, other than grandparents before. The loving, friendly care that the Stepping Stones Staff showed my daughter was priceless. They helped make the transition easier on both my daughter and me. Leaving her with people that showed her such care and patience put my mind at ease through out the day.

My husband and I are currently separated. While we share the financial burden of child care, I would no longer be able to pay my half if Stepping Stones has to raise their fee. I feel that the current open room atmosphere is beneficial for my daughter to interact and play with other children. To have to switch day care facilities now, for my daughter, would be an extremely traumatic experience and I'm not sure how long it may take her to adjust to another place, because she'll fear she'll just be moved again.

Once again, although I feel Stepping Stones care is priceless to me and my daughters my finances and income are what they are and I would no longer be able to afford to send them there. I feel that Stepping Stones far exceeds other day cares both in home and larger facilities with separate rooms that are not as warm and happy environment.

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Child Care Center Rules Advisory Committee

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I prefer to send my child to Stepping Stones over a larger center with many separate rooms because I feel it is a top quality program that offers my child a high quality educational program and allows my child freedom of many choices in a bright, happy Center. I strongly feel that the lower ratio of 1 to 8, which Stepping Stones currently operates at, allows my child/children the safest possible, positive learning environment, at a price families can afford. Thank you for taking the time to further evaluate the implications of this regulation, as I am very concerned about the financial impact that your proposed changes would have on Centers and in turn, families across the State.

Sincerely,

Hollie B. Brock 10/14/04
Name Date
4118 Hancock Dr. Midland, MI 48642
Address City State ZIP

Additional Comments:

Additional Comments:

I have a Master's Degree in elementary education and therefore have studied child development and child psychology. I pulled my children FROM a childcare exactly like what is portrayed as "legal" based on the criteria in the proposed R400.5105b. I chose Stepping Stones (where my children are currently enrolled) *because* my children could play, eat, nap and learn *together*. That *was* my number one reason. The ideal is for the mother to stay home with her children. Should we not model our ideal daycare after that same philosophy? A mother encourages interaction between her multi-aged children. The opportunity to work together enhances family bonding, as well as, personal security. Read about Erickson's well-known studies and theories of psychosocial development. I want my children to have a strong sense of *self* and a strong sense of *family*. Stepping Stones' multi-aged environment facilitates that.

I also appreciate the versatility provided by the open floor plan. *Gross motor skills* are extremely important at these ages. In fact, a child's gross motor skills are *linked* to their cognitive development. Stepping Stones uses this large open area to teach and develop gross motor skills on those cold or rainy days when Michigan children are trapped inside. Separate rooms would limit his movement and therefore, his gross motor skills. The open environment also provides my child with many *choices* to foster and nurture his cognitive development. Studies are proving that *choice* enhances cognitive development. He may choose from dramatic play, reading area, manipulatives, sensory exploration etc. Separate rooms would limit his choices. Stepping Stones provides structured, safe opportunities to foster development of gross motor skills, cognitive skills and social skills to nurture the "whole child". *My child* is a whole child and I want him treated as one. I have the right to choose a childcare facility that can provide this kind of quality care for *my child*.

Hollie Beth Brock
10/13/04

To: Jim Finnamon, Director, Division of Child Daycare Licensing
Child Care Center Rules Advisory Committee

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Sincerely,

Mellisa Hoffman
Name
10/14/04
Date
4510 Jones Rd. Beaverton MI 48612
Address City State ZIP

Additional Comments:

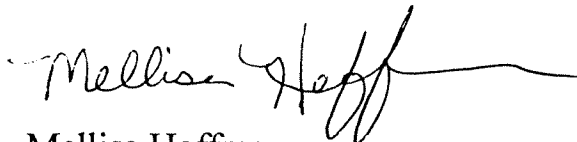
To Whom It May Concern:

As a very concerned parent, I would like to take this opportunity to express my wholehearted support for this proposed exception. My son has been attending Stepping Stones Daycare for a little over a year now. Not once have we ever encountered a problem with the staff, the facilities or the overall environment at Stepping Stones. My son has never been hurt or injured and has always been well taken care of. He feels very secure and comfortable with the building, the staff and his friends who attend with him. It is his "home away from home" for the majority of each week.

If the proposed exception is not considered, more than likely my son will only have a 60% chance of continuing to attend the school that he is so comfortable and happy with. And even if he is allowed to attend, I would not be able then to afford the increased rates required to keep the building open. As it is now, I am paying almost one quarter of my month's salary to keep my son in daycare. I cannot afford to pay much more without sacrificing the ability to pay my other monthly liabilities.

Again, please consider the proposed exception. I do not want to have to upset my son's happiness and routine. I am sure there are many other families that send their children to Stepping Stones that feel the same as I do and have the same concerns.

Thank you,

A handwritten signature in cursive script, reading "Mellisa Hoffman", followed by a long horizontal flourish line.

Mellisa Hoffman

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Child Care Center Rules Advisory Committee

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Sincerely,

Bucki J. Neel
Name 10-12-04 Date
324 Midland MI 48642
Address City State ZIP

Additional Comments:

As a single mom myself having my
children at Stepping Stones I feel that some
of these "new regulations" are going to hurt
not only people like myself but the children as
well. I would have possibly find somewhere else
for my children, in which they have been here over
2 years to go for years. The care my children receive
here is like no other. I finally know I could
not afford to go elsewhere also. And finally these
regulations jeopardize my job - where am I going to
be - & what about my children - These regulations
cannot go into effect for all these obvious
reasons!

To: Jim Finnamon, Director, Division of Child Daycare Licensing
Child Care Center Rules Advisory Committee

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I understand they are asking for proposed rule # R 400.5105b to be amended as follows:

R 400.5105b - Group size for preschool children.

Rule 105b. (1) A center shall assure the following maximum group size:

(a) For children 3 years of age the maximum group size is 20.

(1) An exception shall be granted to centers with rooms caring for not more than 2 groups of children in one self-contained space providing their caregiver to child ratio is lowered to not more than 1:8.

(b) For children 4 years of age the maximum group size is 24.

(1) An exception shall be granted to centers with rooms caring for not more than 2 groups of children in one self-contained space providing their caregiver to child ratio is lowered to not more than 1:10.

(2) When there are mixed age groups in the same room, in self-contained space, on the playground, or trips away from the center, the group size shall be determined by the age of the youngest child in the group.

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This proposed exception would allow for a smaller, one-room center like Stepping Stones to continue to offer the same top-quality childcare we have come to expect at the same family friendly prices that we count on.

I can certainly understand limiting group sizes for larger rooms or centers that have the capability of providing care in multiple classrooms. However, for Stepping Stones, it may mean the following options:

1. They would have to cut their daily enrollment from their current licensed capacity of 34 to the proposed maximum group size of 20, cutting their daily enrollment by 41%. That is an enormous decrease in the amount of families they can provide care for. In doing this, they would be forced to raise their rates that I currently pay by as much as 50% to offset their expenses at a lower enrollment and in order for Stepping Stones to be able to continue providing the quality programs they currently provide. Unfortunately, this is an increase that my family, as well as many others, cannot afford to pay.
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I prefer to send my child to Stepping Stones over a larger center with many separate rooms because I feel it is a top quality program that offers my child a high quality educational program and allows my child freedom of many choices in a bright, happy Center. I strongly feel that the lower ratio of 1 to 8, which Stepping Stones currently operates at, allows my child/children the safest possible, positive learning environment, at a price families can afford. Thank you for taking the time to further evaluate the implications of this regulation, as I am very concerned about the financial impact that your proposed changes would have on Centers and in turn, families across the State.

Sincerely,

Anita Kulpinski 10-11-04
Name Date

4200 Robinhood Midland MI 48642
Address City State ZIP

Additional Comments:

I feel that the new regulations would take away from the qualities I like at Stepping Stones. I like the open space the center has to offer and the centers they are able to provide for the children to play and learn. The new regulations would force Stepping Stones to cut enrollment, change the physical set-up of the center, and increase rates. I am not in favor of these regulations for these reasons. Please do everything in your power to prevent these regulations from going into effect so Stepping Stones can continue the quality daycare ~~that~~ they provide for my three children

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Sincerely,

Tonya M. Coty			10-11-04
Name			Date
3906 E. St. Andrews	Midland	MS	38642
Address	City	State	ZIP

Additional Comments:

I am a single mother that works full-time. I rely on affordable daycare to maintain my employment and provide for my four year old. I chose Stepping Stones for many reasons, including affordability. If they are forced to make increases in rates, I simply will not be able to make ends meet and it will be "unaffordable" for me to work and I will have to rely on public assistance. Please consider the impact you will have on families that are already financially strained. Thank you.

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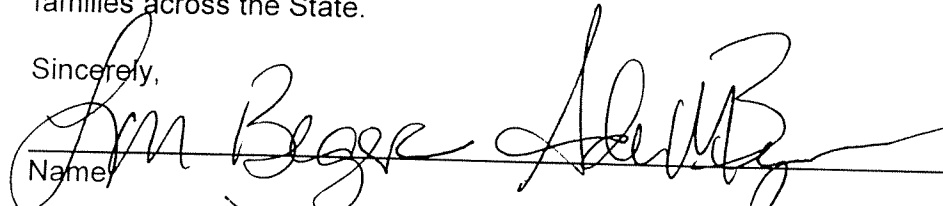
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Sincerely,


Name _____ Date 10/11/04
2801 Dawn Dr Midland MU 48642
Address City State ZIP

Additional Comments:

I can certainly understand this regulation for
large daycare centers. My one question is how does
this benefit the children of Stepping Stones and
those that would be put in the same situation?
Stepping Stones has made some recent improvements
which costs money, as we all know, and they would
have to either cut enrollment or "re-update" everything
they have updated.
My child has thrived on the environment that SS.
has provided for her. I just wonder how this regulation
change would affect that environment.

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Sincerely,

Beckie Speaker 10-12-04
Name Date

3439 N. Sturgeon Midland MI 48642
Address City State ZIP

Additional Comments:

My son, Isaiah, only goes to preschool 2 to 3 times a week, partly for financial reasons partly for me and if these new regulations took effect he would not be able to do that, meaning he would not be able to attend. Besides raise in rate and 5 days, I drive from across town. Our family income is just above enough for Head start. I think it is very important for my son to attend. I would not send him if I didn't think the adult/child ratio was appropriate. Please do not change regulations.

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Sincerely,

Carrie DeBoorn

Name

10-13-04

Date

1414 N. Rumbaugh Ln. Midland

Address

City

MI

State

48642

ZIP

Additional Comments:

My child has been attending Stepping Stones Daycare/Preschool for 3 yrs. I like the fact that it is only one room, and that all of the workers their can see and hear what the other workers are saying and doing with the children. I feel that this new proposal will only raise our rates, which some families can barely afford now. And make some families go to a not so suitable facility, because of the cost of tuition. Please keep the other rules in effect.

Sincerely

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Sincerely,

Karina Palmateer 10-14-024

Name

Date

4603 Isabella Midland MI 48640

Address

City

State

ZIP

Additional Comments:

My son has been thriving in this
program. He loves it. But I am afraid
that with all these changes you
want to make the tuition would
go up and I would be forced to
remove him from the program. I would
not be able to afford it.